Case 1:04-cv-12364-JGD

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OF COUNSEL: PAUL TUTTLE, ESQ.

October 7, 2005

Windy L. Rosebush, Esq. Timothy P. Van Dyck, Esq Edwards and Angell, LLP 101 Federal Street Boston, MA 02110

RE: Sheehan v. Verizon; Civil Action No.: 04-12364JLT

Dear Attorneys Rosebush and Van Dyck:

menin Farelle

Enclosed please find several notices of deposition. Please contact me to discuss whether these times are convenient for you and who, if anybody, will need to be subpoenaed.

Also, pursuant to Local Rules 7.1(A)(2) and 37.1(A), I am requesting that we confer to discuss discovery issues, namely the redacted material (VER 0380-0383) and full report (we were provided the executive summary VER 0393).

Finally, it may be necessary to agree to an extension of time to complete non-expert discovery, please consider this option. I look forward to hearing from you. Thank you for your continued cooperation in this matter.

Very truly yours,

DF/pt encl.